

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
AT MONTGOMERY**

ANNE MARIE HUNTER,

Plaintiff,

v.

DURR SYSTEMS, INC.,

Defendant.

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CASE NO. 2:06CV411-SRW

**MOTION TO EXTEND DEADLINES
AND RESPONSIBILITIES SET OUT IN THIS COURT'S
UNIFORM SCHEDULING ORDER (DOCUMENT 13)**

COME NOW counsel for both the Plaintiff and Defendant and move this Court to extend two (2) deadlines and as grounds for said motion, state the following:

1. That Plaintiff's counsel disclosed two (2) physicians and one (1) psychologist as experts to be utilized in this case on November 1, 2006.

2. That both counsel for the Plaintiff and Defendant have endeavored to schedule the depositions of these experts, without success, due to the Thanksgiving and Christmas holidays and professional schedules of these three experts.

3. That counsel for both the Plaintiff and Defendant have exchanged numerous e-mails in an attempt to schedule these depositions while the doctors and psychologist have had need to change these dates due to their schedules, and that one of these experts may not be deposed until early January.

4. That counsel for both the Plaintiff and Defendant would request that this Court extend two (2) deadlines:

- a. The deadline for Defendant's disclosure of experts from January 15, 2007 to February 15, 2007 as set out in § 8 of Document 13; and
- b. The deadline for completing all discovery as set out in § 7 of Document 13 from February 15, 2007 to March 15, 2007;

5. That all other deadlines would remain the same as set out in this Court's Uniform Scheduling Order (Document 13).

s/ Thomas E. Hankins
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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of November 2006, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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s/ James B. Carlson
Of Counsel